

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

(1)	SCOTTSDALE INSURANCE)	
	COMPANY,)	
)	
	Plaintiff,)	
)	
v.)	CASE NO. 6:24-cv-00150-RAW-DES
)	
(1)	CHIGGERS BAR, LLC;)	
)	
(2)	RANDALL DOLLAR;)	
)	
(3)	GANDY SHANE FARLEY;)	
)	
(4)	SCOTT GENTRY and)	
	KRISTEE GENTRY, as)	
	GUARDIANS of JOSH GENTRY)	
)	
	Defendants.)	

MOTION TO EXTEND DEADLINES

Plaintiff Scottsdale Insurance Company (“Scottsdale”) and Defendants Scott Gentry and Kristee Gentry, as guardians of Josh Gentry (collectively, “Gentry Defendants”), pursuant to Fed. R. Civ. P. 6(b) and LCvR 7.1(i), jointly request a 45 day extension of the deadline, up to and including June 16, 2025, to file a joint status report and a continuance of the May 8, 2025 as set by set by the Court’s Order Setting Rule 73 Scheduling Conference and for Joint Status Report (Doc. 32). In support of this Motion, Scottsdale and the Gentry Defendants (collectively, the “Parties”) state as follows:

1. In this declaratory judgment action, Scottsdale seeks a determination as to the coverage, if any, afforded to Defendants Chiggers Barr, LLC; Randal Dollar; and Gandy Shane Farley (“Chiggers Defendants”) under a policy of insurance Scottsdale issued to Defendant Chiggers Bar, LLC with respect to the lawsuit styled *Scott and Kristee Gentry as Guardians of*

Josh Gentry v. Chigger's Bar, LLC, et al. in the District Court of McCurtain County, Oklahoma, Case No. CJ-2022-61 ("Underlying Action").

2. On July 11, 2024, the Gentry Defendants filed their answer in this action. [Doc. 18]. The Chigger Defendants failed to answer, defend, or otherwise appear in this action, and the Clerk of Court has entered defaults against the Chigger Defendants. [Docs. 29, 31].

3. The Parties have conferred and have made substantial progress toward the likely resolution of this action.

4. Specifically, the Parties anticipate settlement will be finalized with regard to this action and the claims asserted against the Chigger Defendants in the Underlying Action ("Tentative Settlement") within the next 45 days.

5. The Underlying Action involves claims asserted against nonparties to this action ("Nonparty Claims"), which are set for mediation on May 19, 2025.

6. Presently, the Tentative Settlement is subject to certain conditions requested by the Gentry Defendants, which may become moot or otherwise impacted by the mediation of the Nonparty Claims.

7. The requested extension of the May 2, 2025 deadline to file a joint status report and continuance of the May 8, 2025 scheduling conference will serve the interests of judicial efficiency by allowing the Parties to continue ongoing discussions and efforts to finalize the Tentative Settlement following the May 19, 2025 mediation of the Nonparty Claims.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request an Order granting the Parties a 45 day extension of time up to and including June 16, 2025 to file a joint status report and a continuance of the May 8, 2025 scheduling conference.

Respectfully submitted,

/s/ Kenneth W. Boyles, Jr.

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**ATTORNEY FOR DEFENDANTS SCOTT
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GUARDIANS OF JOSH GENTRY**

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing, which will transmit a Notice of Electronic Filing to all counsel of record.

s/Kenneth W. Boyles, Jr. _____